

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff and  
Counter Defendant,

v.

TOWN OF LAC DU FLAMBEAU,

Case No. 3:23-cv-00355-wmc

Defendant and  
Counter Claimant,

and

GORDON ANDERSON et al.,

Intervenor Defendants and  
Intervenor Counter Claimants.

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**DECLARATION OF BRIDGET M. HUBING IN SUPPORT OF  
HOMEOWNERS' MOTION TO SHOW CAUSE**

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Bridget M. Hubing, an attorney duly admitted to practice law in the State of Wisconsin and before this Court, hereby declares and certifies to the best of her knowledge and belief the following:

1. I am a Shareholder at Reinhart Boerner Van Deuren s.c., and counsel for the Intervenor Defendant and Counter Claimant Homeowners (the "Homeowners").

2. I am familiar with the facts and circumstances of the subject matter of this lawsuit and submit this Declaration in support of the Homeowners' Motion to Show Cause or, In the Alternative, Clarification of the Amended Preliminary Injunction (the "Motion") against Plaintiff United States of America ("USA" or "government").

3. Attached as **Exhibit A** is a true and correct copy of a photograph that I took on January 29, 2025 of a sign posted on the south entrance to Annie Sunn Lane, which states:



4. I took the photograph from my vehicle on Little Trout Road. I did not drive to the north-east end of Annie Sunn Lane for fear of being issued a trespass citation or otherwise being arrested by the Band's law enforcement officers and prosecuted in the Band's Tribal Court System.

5. Attached as **Exhibit B** is a true and correct copy of a photograph that I took on January 29, 2025 of the concrete blocks still laying along Annie Sunn Lane.

6. Attached as **Exhibit C**, **Exhibit D**, and **Exhibit E** are true and correct copies of photographs that were taken on January 29, 2025 by one of my clients, showing the sign that is posted on Center Sugarbush Lane, as well as the concrete blocks and surveillance camera that remain in place at the entrance of Center Sugarbush Lane.

7. Attached as **Exhibit F** is a true and correct copy of photographs that was taken by one of my clients showing the sign depicted above erected on the entrance of East Ross Allen Lake Lane.

8. Attached as **Exhibit G** is a true and correct copy of my email to the USA's attorney in this litigation on January 29, 2025, attaching the photo attached hereto as Exhibit F (referenced above), and the USA's attorney's response to my email on January 30, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 31st day of January, 2025.

s/ Bridget M. Hubing  
Bridget M. Hubing  
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